

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

NOKIA CORP., *et al.*,

*Plaintiffs,*

v.

STOUT RISIUS ROSS LLC.,

*Defendant.*

Civil Action No. 3:22-MC-00068-N

**AGREED MOTION TO TRANSFER MOTION TO COMPEL  
TO THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS**

Plaintiffs Nokia Corp., Nokia Solutions and Networks Oy, and Nokia of America Corp. (collectively, “Nokia”) and Defendant Stout Risius Ross, LCC (“Stout”) respectively request that the Court, pursuant to Federal Rule of Civil Procedure 45(f) transfer Nokia’s Motion to Compel Stout to Comply With Subpoena (Dkt. Nos. 1-4) to the United States District Court for the Eastern District of Texas. In support, Nokia and Stout (collectively, “the Parties”) state:

1. On August 19, 2022, Nokia filed its Motion to Compel Stout to Comply With Subpoenas (“Motion”). (Dkt. Nos. 1-3; *see also* Dkt. No. 4 (Nokia’s Amended Motion to Compel Stout to Comply with Subpoena)).

2. This Motion arises out of a lawsuit filed on August 12, 2021 by TQ Delta, LLC against Nokia in the United States District Court for the Eastern District of Texas. *See TQ Delta, LLC v. Nokia Corp.*, No. 2:21-cv-00309-JRG (E.D. Tex.).

3. The United States District Court for the Eastern District of Texas is the district court that issued the subpoenas underlying Nokia’s Motion.

4. Federal Rule of Civil Procedure 45(f) states: “When the court where compliance is required did not issue the subpoena, it may transfer a motion under this rule to the issuing court if the person subject to the subpoena consents or if the court finds exceptional circumstances.” FED. R. CIV. P. 45(f).

5. Stout, the party subject to the subpoena, consents to the transfer of Nokia’s Motion to the issuing court, the United States District Court for the Eastern District of Texas.

6. Accordingly, the Parties respectfully request that the Court transfer Nokia’s Motion (Dkt. Nos. 1-4) to the United States District Court for the Eastern District of Texas for consideration.

Respectfully submitted,

By: /s/ M. Scott Stevens  
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*Counsel for Stout Risius Ross, LLC*

**CERTIFICATE OF CONFERENCE**

Pursuant to N.D. Tex. L.R. 7.1(b), undersigned counsel for Stout certifies that this Motion is agreed to by the Parties.

/s/ William E. Davis, III  
William E. Davis, III

**CERTIFICATE OF SERVICE**

The undersigned certifies that on this 30<sup>th</sup> day of August, 2022 a true and correct copy of the foregoing was electronically filed with the Clerk of Court using CM/ECF, which will send notification to the registered attorney(s) of record that the document has been filed and is available for viewing and downloading.

/s/ William E. Davis, III  
William E. Davis, III